

Thomas F. Gebhart  
Metal Source, Inc.  
P.O. Box 238, Wabash, IN 46992

Re: Registered Construction and Operation Status,  
169-11937-00060

Dear Mr. Gebhart:

The application from Metal Source, Inc. received on February 25, 2000, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-5.1, it has been determined that the following secondary metal processing, to be located at Wabash, Indiana, is classified as registered:

- (a) Ball Mill operating at 2 ton/hr maximum capacity
- (b) Cyclone Separator operating at 2 ton/hr maximum capacity
- (c) Pot Kettle operating at 0.77 ton/hr maximum capacity.
- (d) Gas Burner operating at 0.96 MMBtu/hr maximum capacity.
- (e) Space Heater operating at 0.96 MMBtu/hr maximum capacity.

The following conditions shall be applicable:

Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following:

- (1)
  - (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.
- (2) 326 IAC 6-3-2 (Process Operations)  
The particulate matter (PM) from the secondary metal processing shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and  
P = process weight rate in tons per hour

This registration is the first air approval issued to this source. The source may operate according to 326 IAC 2-5.5.

An authorized individual shall provide an annual notice to the Office of Air Management that the source is in operation and in compliance with this registration pursuant to 326 IAC 2-5.1-2(f)(3). The annual notice shall be submitted to:

Compliance Data Section  
Office of Air Management  
100 North Senate Avenue  
P.O. Box 6015  
Indianapolis, IN 46206-6015

no later than March 1 of each year, with the annual notice being submitted in the format attached.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Management (OAM) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Management

RJC

cc: File -Wabash County  
Wabash County Health Department  
Air Compliance -Brian Hillman  
Permit Tracking - Janet Mobley  
Technical Support and Modeling - Michele Boner  
Compliance Data Section - Karen Nowak

<b>Registration Annual Notification</b>
---

This form should be used to comply with the notification requirements under 326 IAC 2-5.1-2(f)(3)

<b>Company Name: Metal Source, Inc.</b>
<b>Address: 505 W. Canal Street</b>
<b>City: Wabash, Indiana</b>
<b>Authorized individual:</b>
<b>Phone #:</b>
<b>Registration #: 169-11937-00060</b>

I hereby certify that Metal Source, Inc. is still in operation and is in compliance with the requirements of Registration 16911932-00060.

<b>Name (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

## **Indiana Department of Environmental Management Office of Air Management**

### **Technical Support Document (TSD) for a Registration**

#### **Source Background and Description**

Source Name: Metal Source . LLC  
Source Location: 505 W. Canal Street, Wabash, Indiana 469992  
County: Wabash  
SIC Code: 3341  
Operation Permit No.: 169-11937-00060  
Permit Reviewer: R. Joe Crawford

The Office of Air Management (OAM) has reviewed an application from Metal Source, LLC relating to the construction and operation of secondary metal processing.

#### **New Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units and pollution control devices:

- (a) Ball Mill operating at 2 ton/hr maximum capacity
- (b) Cyclone Separator operating at 2 ton/hr maximum capacity
- (c) Pot Kettle operating at 0.77 ton/hr maximum capacity.
- (d) Gas Burner operating at 0.96 MMBtu/hr maximum capacity.
- (e) Space Heater operating at 0.96 MMBtu/hr maximum capacity.

There is no Pollution Control Equipment or outside vents located at this source.

#### **Recommendation**

The staff recommends to the Commissioner that the construction and operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on February 25, 2000.

#### **Emission Calculations**

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided in Appendix A of this document (6 pages).

## Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential To Emit (tons/year)
PM	0.0
PM-10	23.1
SO <sub>2</sub>	0.0
VOC	0.0
CO	0.2
NO <sub>x</sub>	0.5

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM<sub>10</sub> is greater than 5 tons per year but less than 25 tons per year; therefore pursuant to 326 IAC 2-5.1-2(a)(1)(A) a registration is required.

## County Attainment Status

The source is located in Wabash County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Wabash County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Wabash County has been classified as attainment or unclassifiable for pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

## Source Status

New Source PSD Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	0.0
PM10	23.1
SO <sub>2</sub>	0.0
VOC	0.0
CO	0.2
NO <sub>x</sub>	0.5
Single HAP	0.2
Combination HAPs	0.8

- (a) This new source is not a major stationary source because even though it is one of the 28 listed source categories, it does not emit 100 tons per year or more of any regulated pollutant. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

## Part 70 Permit Determination

### 326 IAC 2-7 (Part 70 Permit Program)

This new source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

This is the first air approval issued to this source.

## Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR art 63) applicable to this source.

## State Rule Applicability - Entire Source

### 326 IAC 2-6 (Emission Reporting)

This source is located in Wabash County and the potential to emit VOC and NO<sub>x</sub> is less than ten (10) tons per year. The source is one of the twenty-eight (28) listed sources and its potential to emit PM10 is less than one-hundred (100) tons per year including fugitive emissions. It does not meet any criteria set forth in 326 IAC 2-6-1Sec 1 (a)(b)(c)(d) (Applicability of Rule), therefore, 326 IAC 2-6 does not apply.

### 326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations) shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

### **State Rule Applicability - Individual Facilities**

#### **326 IAC 6-3-2 (Process Operations)**

The particulate matter (PM) from the secondary metal processing shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

$PM_{10} = 4.25 \text{ lb/hr (actual)}$ ,  $PM_{10} = 6.52 \text{ lb/hr (allowable)}$ , therefore the source will comply with rule 326 IAC 5-1 without benefit of emission controls.

### **Air Toxic Emissions**

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Construction Permit Application Form Y.

- (a) This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Clean Air Act Amendments.

### **Conclusion**

The construction and operation of this secondary metal processing shall be subject to the conditions of the attached proposed New Source Construction and Minor Source Operating Permit 169-11937-00060.





## **APPENDIX A**

**Metal Source, LLC  
505 W. Canal Street, Wabash, Indiana 46992  
Wabash County  
SIC Code:3341  
Operation Permit No.:169-11937-00060  
Permit Reviewer:R. Joe Crawford**